

# **EXHIBIT 12**

**Pierce County**

**Office of Prosecuting Attorney**

REPLY TO:

**CIVIL DIVISION**

930 Tacoma Avenue South, Suite 946  
Tacoma, WA 98402

**MARY E. ROBNETT**  
Prosecuting Attorney

Main Office: (253) 798-6732

August 12, 2024

**VIA EMAIL**

To: All Counsel

RE: *Wolfclan v. Pierce County* (23-cv-5399-TSZ-SKV)  
General ESI Search

Counsel:

The following are the test results to Plaintiff's general search request. Approximately 5 hours of employee and attorney time used. The following two categories of test results are provided: (1) SHR (Sheriff Dept.) and SHRJ (Jail) custodial search; and (2) SHRJ custodial search only. Test searches 2-5 are limited searches with sample general terms supplied by Plaintiff that are used to show how general terms used in search 1 returned a large result. The below search results are overbroad. Defendants maintain all prior objections and consistent with ESI Agreement ¶C(2)(a)(iii) request that Plaintiff identify search term queries for specific requests for production. Please advise.

**Custodian:** Sheriff Dept. SHR and SHRJ

**Database:** Emails (search includes attachments to emails); we are also searching phone records but search is proving unduly burdensome and not complete at this time

**Date Range:** 4/8/20 – 5/2/23

**1. PAT 24-386\_723136-1 (SHR and SHRJ): Primary test search based on terms as provided by Plaintiff:**

"Toilet\*" OR "Plumb\*" OR "Lavator\*" OR (Maintenance AND (toilet OR "plumb\*" OR "lavator\*" OR "flush\*" OR sewer OR sewage OR kiosk OR "water closet" OR "pip\*" OR cistern OR "fixtur\*")) OR ("Maintain\*" AND (toilet OR "plumb\*" OR "lavator\*" OR "flush\*" OR sewer OR sewage OR kiosk OR "water closet" OR "pip\*" OR cistern OR "fixtur\*")) OR ((Grievance OR grieve OR "complain\*") AND (toilet OR sewage OR "lavator\*" OR "flush\*" OR sewer OR "plumb\*" OR "backflow\*" OR "overflow\*" OR sanitary OR "sanitat\*" OR unsanitary OR "clean\*" OR "condition\*" OR feces OR health OR "safe\*" OR "pip\*" OR cistern OR health OR "safe\*" OR "fixtur\*")) OR ((("Repair\*" OR "replac\*" OR install OR "inspect\*" OR "fix\*" OR "report\*" OR "problem\*" OR defect OR issue OR broken) AND (toilet OR "plumb\*" OR "lavator\*" OR "flush\*" OR sewer OR sewage OR kiosk OR "water closet" OR "pip\*" OR cistern OR "fixtur\*")) OR Inhumane

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OR Unsanitary OR ("Flood\*" AND (cell OR unit)) OR "soapy water" OR "drainage pipe\*" OR "drain pipe\*" OR Noxious OR "Gas\*" OR Toxic OR Sewage OR Sewer OR "Backflow\*" OR "Overflow\*" OR Unsanitary OR Sanitary OR "Sanitat\*" OR (health NEAR 3 safety) OR (Flush NEAR 3 "valve\*") OR "Clean\*" OR "Condition\*" OR Feces OR "Backflush\*" OR "Back pressure" OR "Back siphonage" OR (Report AND ("water closet" OR kiosk)) OR ("Engineer\*" AND report AND 2014) OR ("Consult\*" NEAR 3 "engineer\*") OR Hultz OR (Tiffany NEAR 3 Roberts) OR "Chase stack" OR Chase(c:c)(date=2020-04-08..2023-05-02)(kind=Email)

**Email: 1,141,046 item(s) (719.67 GB)**

**Archived Text Messages: 7 item(s) (2.49 MB)**

a. **PAT 24-386\_723136 (SHRJ only)**

**Email: 433,017 item(s) (207.79 GB)**

**Archived Text Message: 2 item(s) (55.12 KB)**

**2. PAT 24-386\_723136-2 (SHR and SHRJ):**

"Toilet\*" OR "Plumb\*" OR "Lavator\*"(c:c)(date=2020-04-08..2023-05-02)(kind=Email)

**Email: 41,304 item(s) (79.05 GB)**

a. **PAT 24-386\_723136-2 (SHRJ only)**

**Email: 20,397 item(s) (29.93 GB)**

**3. PAT 24-386\_723136-3 (SHR and SHRJ):**

("Maintain\*" AND (toilet OR "plumb\*" OR "lavator\*" OR "flush\*" OR sewer OR sewage OR kiosk OR "water closet" OR "pip\*" OR cistern OR "fixtur\*")) OR ((Grievance OR grieve OR "complain\*") AND (toilet OR sewage OR "lavator\*" OR "flush\*" OR sewer OR "plumb\*" OR "backflow\*" OR "overflow\*" OR sanitary OR "sanitat\*" OR unsanitary OR "clean\*" OR "condition\*" OR feces OR health OR "safe\*" OR "pip\*" OR cistern OR health OR "safe\*" OR "fixtur\*")) OR ((("Repair\*" OR "replac\*" OR install OR "inspect\*" OR "fix\*" OR "report\*" OR "problem\*" OR defect OR issue OR broken) AND (toilet OR "plumb\*" OR "lavator\*" OR "flush\*" OR sewer OR sewage OR kiosk OR "water closet" OR "pip\*" OR cistern OR "fixture\*")) (c:c)(date=2020-04-08..2023-05-02)(kind=Email)

**Email: 251,561 item(s) (343.01 GB)**

a. **PAT 24-386\_723136-3 (SHRJ only)**

**Email: 85,174 item(s) (100.64 GB)**

**4. PAT 24-386\_723136-4 (SHR and SHRJ):**

Inhumane OR Unsanitary OR ("Flood\*" AND (cell OR unit)) OR "soapy water" OR "drainage pipe\*" OR "drain pipe\*" OR Noxious OR "Gas\*" OR Toxic OR Sewage OR Sewer OR "Backflow\*" OR "Overflow\*" OR Unsanitary OR Sanitary OR "Sanitat\*" OR (health NEAR 3 safety) OR (Flush NEAR 3 "valve\*") (c:c)(date=2020-04-08..2023-05-02)(kind=Email)

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**Email: 376,579 item(s) (333.61 GB)**

a. **PAT 24-386\_723136-4 (SHRJ only)**

**Email: 131,335 item(s) (104.77 GB)**

**5. PAT 24-386\_723136-5 (SHR and SHRJ):**

"Clean\*" OR "Condition\*" OR Feces OR "Backflush\*" OR "Back pressure" OR "Back siphonage" OR (Report AND ("water closet" OR kiosk)) OR ("Engineer\*" AND report AND 2014) OR ("Consult\*" NEAR 3 "engineer\*") OR Hultz OR (Tiffany NEAR 3 Roberts) OR "Chase stack" OR Chase(c:c)(date=2020-04-08..2023-05-02)(kind=Email)

**Email: 826,863 item(s) (525.22 GB)**

a. **PAT 24-386\_723136-5 (SHRJ only)**

**Email: 331,172 item(s) (163.47 GB)**

Sincerely,

*s/ Frank A. Cornelius*

Frank A. Cornelius  
Deputy Prosecuting Attorney  
(253) 798-

FAC/nb/jh